

FILED

JUL - 2 2014

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAROD HORVATH,  
CASEY CRACCO,  
JAMES ROAM,  
AMBER SCHLOTTACH,  
BRYAN SCHLATER,  
JEFFERY MADDOX,

Defendants.

No.

**4:14CR00213 HEA/NAB**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

Beginning at an exact time unknown to the Grand Jury but including April 30, 2013 and continuing thereafter to the date of this Indictment, in the Eastern District of Missouri and elsewhere, the defendants,

**JAROD HORVATH,  
CASEY CRACCO,  
JAMES ROAM,  
AMBER SCHLOTTACH,  
BRYAN SCHLATER, and  
JEFFERY MADDOX**

the defendants herein, did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: the defendants knowingly conducted and attempted to conduct financial transactions affecting interstate or foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is,

the distribution of marijuana, a Schedule I controlled substance, with the intent to promote the carrying on of the specified unlawful activity; and designed the transactions in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

All in violation of in violation of Title 18, United States Code, Section 1956(h).

### **FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 982, upon conviction of an offense in violation of Title 18, United States Code, Section 1956(h) as set forth in Count I of the Indictment, the defendant identified therein shall forfeit to the United States of America:

- a. any property, real or personal, involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1956; and
- b. any property traceable to such property.

2. Subject to forfeiture is a sum of money equal to \$100,000 which is the total value of any property, real or personal involved in transactions or attempted transactions in furtherance of the offense charged in Count I.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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Stephen Casey #58879MO  
Assistant United States Attorney